



WIC PROGRAM

***Building a Healthy Montana
Promoting & Supporting
Breastfeeding***

Cogswell Building 1400 Broadway Helena MT 59620

MEMORANDUM

TO: Regional WIC Directors

FROM: Joan Bowsher, Montana WIC Director

DATE: January 21, 2009

NUMBER: A - 03 - 09

SUBJECT: Inquiry from MAWA About Clinic Procedures

The MAWA Executive Board asked for clarifications on the following questions:

1. When do you recheck a hemoglobin that is below normal values and is this guideline noted in the State Plan?

The answer to this question is in Policy 5-11 under VIII on about page 204 and is as follows:

VIII. Hematocrit/Hemoglobin Follow-up

For all participants, if a hematocrit/hemoglobin screen is below the established cut-off value, a follow-up test must be performed during the next one to two months. Nutrition education related to iron sources, enhancers and inhibitors must also be provided. Appropriate referrals should be made according to Policy 5-13 Designated Referrals form High Risk WIC Participants.

2. Can you use an infant's or woman's Medicaid card to verify income for other children on the program and is it noted in the State Plan?

Medicaid cards are never used to verify income. They are used to provide identification and to use the eligibility number to verify adjunctively or presumptive eligibility thru SIS. Can an infant's or pregnant woman's proof of participation in Medicaid (i.e. SIS or a letter from OPA) be used as proof income for a

child in the household? That is correct. A child's participation in Medicaid may only be used as proof of income for that child, no one else in the household. Reference: 2009 State Plan, Chapter 5, Policy 5-24, Section III, p. 264; Chapter 5, Policy 5-18, pp. 245 & 246.

Policy Number: 5-24

Financial Eligibility

Effective/Revised Date: October 1, 2007

I. Adjunctive Eligibility

- A. Persons who report they are enrolled in specific qualifying State or Federal programs in Montana must provide proof of such participation for the month of WIC application. Local Agencies may not use a previous certification (within 60 days) financial determination when a participant is using adjunctive eligibility.
- B. Proof of participation may be verified through SIS, see Policy 5-18, Search and Inquiry System (SIS), for Adjunctive Income Verification or through written letters, or forms from the Office of Public Assistance (Montana) documenting current participation in one of the approved Federal or State programs.
- C. Participants using adjunctive eligibility do not need to provide additional financial proof as they are adjunctively (automatically) income eligible for WIC. Participants who claim adjunctive eligibility status do not fill out the zero income form, but need to self-declare their income.
- D. The self-declared income figure must be recorded in the paper chart and the computer for data collection purposes. (no zero income figures are to be recorded in the computer)
- E. Participation in Federal or State administered programs which routinely verify income, that are not listed, must be approved by the State WIC Agency.
- F. Programs Providing Adjunctive and/or Presumptive Eligibility
 - 1. Temporary Assistance to Needy Families (TANF - formerly AFDC)
 - 2. Food Stamps
 - 3. Medicaid (includes Medically Needy program, where participants receive eligibility on a monthly basis)
- G. TANF or Medicaid applicants who are found presumptively eligible pending completion of the eligibility determination process are also automatically WIC income eligible. These applicants must show proof of presumptive eligibility.

The WIC office must issue only one month benefits and get documentation of final eligibility before issuing further benefits.

Policy Number 5-18

Search and Inquiry System (SIS) for Adjunctive Income Verification

Effective/Date: July 15, 2005

Search and Inquiry System (SIS) for Adjunctive Income Verification

Purpose

To ensure that Local Agency (LA) staff verify and document current adjunct or automatic income eligibility (AAIE) at participant certifications. LA verification of adjunct eligibility will create an audit

trail which the State Agency (SA) will use for monitoring purposes.

Authority

USDA FNS 7 CFR Part 246.7, Montana WIC State Plan, Chapter 5

Policy

The LA staff shall verify and document the current AAIE of any WIC Program applicant claiming AAIE at their certification appointment.

Procedures

- I.** Procedures for LAs to access the SIS are in the SIS Quick Guide and as per instructions given at the Spring Public Health Meeting (2005).
- II.** Adjunct eligibility must be verified for the month of certification. Adjunct eligibility can be verified prior to the appointment and applicants do not need to be present during the verification.
- III.** LAs will document the results from the SIS on the Certification Form and Eligibility Statement (CFES) as per the following examples:

Cert. Date	Income Source	Document Number(s)	Date of Document(s)
Date of "C"	Medicaid	Participant Number	Date of Verification or
Date of "C"	Food Stamps	Participant Number	Date of Verification or
Date of "C"	TANF	Participant Number	Date of Verification

On the CFES, WIC staff must document the certification date, the income source (i.e., Medicaid or FS or TANF, the document number(s) (i.e., whose participant # did you assign to your query at the time of verification), the date of document(s) (i.e., the date the verification was done).

- V.** All AAIE eligible participants must have their eligibility verified via the SIS (or via paper documents). Verification via SIS will leave the required audit trail.

Guidelines

- I.** If an applicant will be claiming AAIE at a certification appointment, LAs will determine which household member(s) to verify using SIS (or via paper documents).
- II.** If the applicant is a pregnant woman or an infant and their current Medicaid AAIE status is YES, any household member applying for WIC would be determined financially eligible. Each WIC applicant in the household must be confirmed in the SIS screen to document income verification and create an audit trail.
- III.** If the applicant is a breastfeeding woman, postpartum woman or child and their current Medicaid AAIE status is YES, only they would be determined financially eligible for WIC.

- IV. If the applicant, or a member of the household, is eligible to receive food stamps or temporary assistance for needy families (TANF) and their current AAIE status is YES, they would be determined financially eligible for WIC. Each WIC applicant in the household must be confirmed in the SIS screen to document income verification and create an audit trail.
- V. If a participant informs your office of any change in circumstance (AAIE, financial, household size, etc.), which would effect WIC eligibility, the LA must follow-up on that information.

3. Is it noted in the State Plan that a client can self declare income for one month if verification of income is not available at the time of the certification and how/where is this to be documented?

Upon researching the State Plan and the Federal Rules the state office stands corrected on this issue. All participants/applicants must show proof of household income or documentation of enrollment or presumptive eligibility in a qualifying adjunctive program (TANF, FS, MA). Out of state transfers can self declare income until further documentation is received or their next certification. The only other participants who can self declare income are tribal members living within the Reservation boundaries of their tribe. Reference: Chapter 5, Policy 5-24, Section XVI, pp. 268 & 269; Section XVII, pp. 269 & 270; and Section XVIII, p. 271.

Policy Number: 5-24

Financial Eligibility

Effective/Revised Date: October 1, 2007

XVI. Income

- A. Documenting Income. All participants/applicants must show proof of household income or documentation of enrollment or presumptive eligibility in a qualifying adjunctive program (TANF, FS, MA).***
- B. Payroll check stubs (minimum of 1 month), tax returns, Medicaid eligibility, Food Stamp eligibility, TANF eligibility, letter of award for unemployment, or letter of award of SSI payments can be used for documentation.***

Overtime income would be counted based on the frequency and amount received. Look at the year-to-date on a pay stub to determine if the overtime income would count (i.e., on April pay stubs, the participant has earned \$1,000 in overtime. This would compute out to a yearly overtime amount of \$3,000).

- C. Local Agencies must either take a photocopy of original documents and attach to the participants file or record the following information on the Certification Form and Eligibility Statement:**
 - 1. Date of issuance, time period covered or other identifying information
 - 2. Document number
 - 3. Employer name
 - 4. Gross dollar amount
 - 5. To whom the income is issued

If any of the above criteria are missing from the form of financial documentation, you must photocopy the document and place in the chart.

- D. WIC participants from the same family certified within 60 days of each other, do not require a second financial eligibility determination within the 60 day period, unless they are using MA adjunctive eligibility.
If a participant (household) is using Medicaid as adjunctive/presumptive eligibility, then the second certification requires income to be documented.
- E. The participant and WIC staff will need to sign the CFES form for each certification. Certifications more than 60 days apart require separate financial eligibility determinations.
- F. Instream migrant farmworkers and their family members with expired VOC cards shall be declared to satisfy the State WIC Agency's income standard provided that the income of that instream migrant farmworker family is determined at least once every 12 months.
- G. Any determination that members of an instream migrant farmworker family have met the income standard, either in the migrant's home base area before the migrant has entered the stream for a particular agricultural season, or in an instream area during the agricultural season, shall satisfy the income criteria for any subsequent certification while the migrant is instream during the 12-month period following the determination.
- H. Income amount for out-of-state transfers is based on self-declared income until further documentation is received or the next certification.

XVII. Income Not Counted

- A. Income not to be reported or counted in the determination of a household's eligibility for WIC includes:
 - 1. *Any cash income or value of benefits a household receives from any Federal program that excludes such income by legislative prohibition, such as the value of food stamps provided under the Food Stamp Program. (See WIC Regulations, Subpart C - Participant Eligibility 246.7 (c)(2)(iv)(c)(8) page 281). Any subsidy a household receives through the prescription drug discount card program must not be treated as income in determining income eligibility for the WIC Program (Section 1860D-31(g)(6) of the Social Security Act).*
 - 2. Student financial assistance, such as grants and scholarships, provided for the costs of attendance at an educational institution received from any program funded in whole or part under Title IV of the Higher Education Act of 1965 is excluded from income (ref. 7CFR246.7(c)(2)(iv)(L)), including:
 - a. Pell Grant
 - b. Supplemental Educational Opportunity Grant
 - c. State Student Incentive Grants
 - d. National Direct Student Loan
 - e. PLUS
 - f. College Work Study
 - g. Byrd Honor Scholarship
 - 3. Loans, such as bank loans, since these funds are only temporarily available and must be repaid.
 - 4. Income received under the National Flood Insurance Program (NFIP) shall be excluded when determining household income.
 - 5. The Department of Defense is providing funds to certain members of the Armed Forces and their families through the Family Subsistence Supplemental Allowance (FSSA). When determining household income these funds shall be excluded.

6. The value of in-kind compensation, such as military on-base housing, or any other non-cash benefit. (A military cash housing allowance is not counted as income, but other military benefits received in cash, such as food or clothing allowances, CONUS or OCONUS COLAs, must be considered as income (see policy 5-4 Military Personnel Income).
 7. Occasional earnings received on an irregular basis (i.e., not recurring, such as payment for occasional babysitting or mowing lawns). You may need to make a judgment on receipt of this income.
 8. Overtime Income may or may not be counted based on the frequency and amount received. Look at the year-to-date on a pay stub to determine if the overtime income would count (i.e., on April pay stubs, the participant has earned \$1,000 in overtime. This would compute out to a yearly overtime amount of \$3,000).
 9. Earned Income Tax Credit funds received by a member of the household, whether received throughout the year or as a lump sum.
- B. There are limited exceptions where income documentation would not be required. These would include, but not be limited to:
1. An individual for whom the necessary documentation is not available (individuals who have lost everything due to theft, fire, flood or other disaster).
 2. An individual, such as a homeless woman or child, for whom the requirement would present an unreasonable barrier.
 3. Certain in-stream migrant farmworkers and their family members with expired VOC cards.
- C. Check with the State WIC Office to verify if an income documentation exception would be allowed.

XIX. Native American Households

- A. Definition: “Native American household” is defined as containing at least one enrolled tribal member, pursuant to the resident Tribe’s enrollment requirements.
- B. Documentation of a household member’s enrollment must be maintained in the participant file (on the CFES - Reservation Program form).
- C. Each Reservation program shall post in a conspicuous place Policy 5-2, Income Guidelines, which shows maximum family income allowed for family size.
- D. Income documentation for Native American WIC households living within Reservation boundaries shall be as follows:
 1. Each applicant participating in a Reservation WIC program, or the applicant’s parent or caregiver, shall sign the Certification Form and Eligibility Statement – Reservation Program (provided by the State WIC office) stating the applicant’s family income does not exceed the maximum. This will be done at each certification.

Note: Participants using tribal enrollment as income verification do not need to fill out the zero income statement, just declare their income on the Certification Form and Eligibility Statement – Reservation Program.
- E. Each Reservation WIC program may verify income eligibility of any Native American applicant according to established WIC policies and published WIC regulations and record the correct income amount in the certification record.
- F. Length of residency in the service area will not be considered a test for eligibility. The Reservation boundary will be the service area.

G. Non-Native American applicant households shall not use the above abbreviated income procedure even though they may be served by the Reservation program.

4. Can an addendum be added to the State Plan if there are guidelines to the above questions but they are not recorded in the State Plan?

Corrections or changes in the State Plan would be made in the 2010 version. This decision is based on the amount of review USDA must make on food packages policies that are currently being submitted by states as they are ready and the date of submission for the 2010 State Plan.

5. Also, would it be possible to note on the Monday morning newsletter that you send to the local agencies which deficiencies you see most common during monitor visits and how to correct them?

The information about “findings” and “by next time” from all of the prior fiscal year’s monitoring visits is being compiled into a report. The report is expected to be created annually and released in later January or early February. When the report for fiscal year 2008 is completed it will be sent with a WIC Weekly.